



MORSE
SIGNAL DEVICES

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September 16, 1996

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Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, M.W.
Washington, D.C. 20554

Re: CC Docket No. 96-152

Dear Mr. Caton:

It came to my attention that the Federal Communication Commission is considering rules to implement the alarm monitoring provisions of the Telecommunications Act of 1996.

Morse Signal Devices of San Diego has been providing alarm monitoring services for the past thirty nine (39) years in San Diego.

The CC Docket No. 96-152 which will implement Section 275 of the 1996 Act is of the utmost importance to our small family operated business. Morse Signal urges the Commission to make sure to interpret Section 275 as intended by Congress and to defy the Pacific Bell Company attempts to change the Section 275 to a meaningless technical provision.

We, at Morse Signal with our fifty (50) employess, are completely dependent upon our local Pacific Bell Company.

They control and still enjoy a "deregulated monopoly" over the transmission of all telephone line facilities that we totally depend upon. They know each and every single subscribers of ours, an advantage non-existent in any other industry. This situation makes us very vulnerable to the anti-competitive behavior of Pacific Bell Company. They badly want to compete with alarm companies, as if the five year ban imposed upon them didn't even exist.

Morse Signal is also aware of the fact that Ameritech has it's own interpretation of Section 275, that would subvert the ban of their acquisitions of other alarm monitoring services for five years.

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Ameritech announced the purchase of the alarm business of Circuit City Stores, and solicited many other alarm companies to try to buy them out. They attempted to approach us as well. If they are allowed to have their way, their reading of Section 275 will wipe out the five year prohibition on Ameritech acquisition of other alarm companies. This would effectively wipe out the protection given to small alarm companies like our own.

Morse Signal understands that another Bell Company, namely U.S. West claims that it offered monitoring services before November 30, 1995 and therefore would qualify to be in the alarm business, just as Ameritech. It is vital to our company that the other Bell Companies do not succeed in escaping the provisions of Section 275.

It is of the utmost importance that the five year ban not be destroyed until local competition can develop and provide alarm companies with other services of transmission to replace the present monopolistic way of the Pacific Bell Company.

Morse Signal feels that the 1996 Act was a compromise between the alarm companies great concern of the Bell Companies ambitious plan of being in the alarm business and their anti-competitive conduct. The five year prohibition will permit local competition to provide us with alternate ways of transmission before the Bell Companies entry into the alarm business. This would be fair to both parties. However, to permit the Bell Company to have their way in interpreting Section 275 would destroy the entire 1996 Act.

Morse Signal is disturbed and hopes that the F.C.C. will absolutely appose the devious tactics and the complete shocking disregard and directives of Section 275. Otherwise, the alarm companies would become extinct species and the consumer would become their captive audience.

Sincerely,

MORSE SIGNAL DEVICES

A handwritten signature in dark ink, appearing to read "R. Berlin".

Robert J. Berlin
Managing Partner

RJB:te

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There are 16,000,000 small business owners in the U.S.A., and we sometimes get the feeling of having no voice in the way our cities, states, or the nation are run.

Nevertheless there is a way to win in the battle against control of this great nation by the powers of BIG GOVERNMENT, BIG LABOR, or BIG BUSINESS.

We, the small businesses, do have tremendous strength, and all we have to do is to exercise it.

Consider these facts about small businesses' real economic power:

- *Small businesses form 97% of the total number of companies in the United States.

- *Small businesses directly influence over 80 million eligible voters.

- *America's small businesses create 87% of all new jobs.

- *Our innovative small businesses create 65% of all new inventions.

- *Small businesses create 47% of the gross national product. (GNP)

- *Small businesses create 24 times the number of research and development (R&D) breakthroughs as big businesses.

Despite this, we receive only 25% of the total business profits. Too many small businesses have already disappeared.

We, the burglar alarm companies, are also small businesses struggling to survive. Now we do need your help to protect the free enterprise system from becoming an extinct species.

The above facts are the reason why we need your help and support.

MORSE SIGNAL DEVICES